

Core Business Process I– Student Aid Application and Eligibility Determination Process

Risk Mitigation and Contingency Options Matrix

SFA Application and Eligibility Determination Core Processing

Minimum Acceptable Level of Service: N/A

Decomposition of Sub-Process:				1. Eligibility determination – Eligibility for Title IV funds are verified by matching data against other sources of information. These matches determine whether or not the applicant is in default on a student loan, is an ineligible alien, has not registered for the draft, has been denied eligibility as a result of a drug conviction, or has misreported a social security number.				
Core Business Process:				Student Aid Application and Eligibility Determination Process				
Scenario Section				Business Priority Section			Possible Options	
Failure Source	Threat/Failure Scenario	Impact/End Result	Earliest Failure Date	Impact Priority Rating Rating	Risk Rating		Risk Mitigation Options	High-Level Contingency Options
CPS Core Processing	Hardware or software failure within the core CPS is preventing the data matches that determine eligibility for Title IV programs.	The eligibility of students for Title IV programs will not be accurately known. Eligibility reports will not accurately reflect data matches showing misreporting of other federal program benefits, invalid citizenship status, drug convictions, failure to register for the draft, and inaccurate social security number. This could allow ineligible applicants to receive federal funds.	01/03/2000	High	Low	Med	To mitigate the risk that the CPS would not be able to match data with other agencies to determine eligibility, ED would allow filing of the 2000-2001 application cycle prior to January 2000.	If the CPS cannot match data with other agencies, NCS (the current vendor) would maintain the ability to act as the processing site in Iowa City. (Processing is being moved to Meriden, CT.)

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Minimum Acceptable Level of Service:

	<u>1999-2000</u>	<u>2000-2001</u>
1. 1/3/2000	2 weeks	3 weeks
2. Early March 2000	1 week	1 week
3. No material difference	Would not fix	Fix before disbursement

Decomposition of Sub-Process:				2. Expected Family Contribution (EFC) calculation – EFC calculation determines financial need for post-secondary education based on the income of family members, available assets, and parental dependency status of the applicant.				
Core Business Process:				Student Aid Application and Eligibility Determination Process				
Scenario Section				Business Priority Section			Possible Options	
Failure Source	Threat/Failure Scenario	Impact/End Result	Earliest Failure Date	Impact Rating	Risk Priority Rating		Risk Mitigation Options	High-Level Contingency Options
CPS Core Processing	Hardware or software systems supporting EFC calculations fail. The central processing system is unable to calculate expected family contributions.	Unless expected family contributions can be calculated, outputs to delivery partners will not be available. Financial aid cannot continue without needs analysis packaging for students. This affects all output to schools, other ED systems, states, and private providers of student financial aid. Ultimately, the payment of funds for students that can demonstrate all levels of need will not be available.	01/03/2000	High	Low	Med	<p>To mitigate the risk that the inability to calculate expected family contributions stalls the processing of aid applications, ED would:</p> <ul style="list-style-type: none">• Use last year’s EFC for renewal applications. Note that renewal applications comprise 10% of all applications for year 1 and 40% for year 2. Therefore, this policy would need to be employed with other alternatives.• Decentralize and delegate the EFC calculation process to schools. Schools could obtain the appropriate software from FAFSA on the Web or directly from ED.	<p>If expected family contributions cannot be calculated, ED would institute the following contingencies:</p> <ul style="list-style-type: none">• Students would use FAFSA on the Web to complete an application. This will provide EFC data to the CPS.• NCS (the current vendor) will maintain the ability to act as the processing site in Iowa City. (Processing is being moved to Meriden, CT.)• An analogue of the software that can run on the processor hardware would be developed.• An exclusive Web site for 1999 – 2000 applications would be developed (only for high-impact students).

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Minimum Acceptable Level of Service: 0 Day

Decomposition of Sub-Process:				1. ED Customer Service - ED Customer Service provides information to the public about the status of applications or corrections to applications. ED Customer Service accesses data from the CPS to enable phone counselors to assist an applicant in making complicated aid application corrections.				
Core Business Process:				Student Aid Application and Eligibility Determination Process				
Scenario Section				Business Priority Section			Possible Options	
Failure Source	Threat/Failure Scenario	Impact/End Result	Earliest Failure Date	Impact Priority Rating Rating	Risk Rating		Risk Mitigation Options	High-Level Contingency Options
SFA Customer Service	Software or communications fail.	The status of processing and assistance in completing forms would not be available to the public. The department's ability to communicate information about federal student aid applications would be hindered. Students, families, and financial aid professionals would not have the benefit of current information or of assistance with the completion of applications. This would delay application corrections. In addition, if individuals cannot determine whether their application is being processed, this could lead to multiple submissions of applications.	01/03/2000	Med	Low	Med	None.	In the case of software or communications failure, ED would allow ED Customer Service to access a computer-readable copy of the CPS system created prior to 1/1/2000. ED Customer Service would be able to access this copy of the system on-sight.

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Minimum Acceptable Level of Service:

	<u>1999-2000</u>	<u>2000-2001</u>
ISIR is correct and SAR is incorrect	3 weeks	3 weeks
SAR is correct and ISIR is incorrect	N/A	1 week

Decomposition of Sub-Process:				2. Generate an ISIR (Institutional Student Information Record) – An ISIR is an electronic file that is transmitted to institutions to report the results of an application for federal student aid.				
Core Business Process:				Student Aid Application and Eligibility Determination Process				
Scenario Section				Business Priority Section			Possible Options	
Failure Source	Threat/Failure Scenario	Impact/End Result	Earliest Failure Date	Impact Priority Rating	Risk Rating		Risk Mitigation Options	High-Level Contingency Options
CPS Core Processing	Software, hardware, or communications fail.	Schools will not have information regarding the expected family contribution or the determination of eligibility for packaging aid. School systems that rely on electronic exchange of data for awarding aid will be seriously effected. In many cases, the ISIR serves as the first notification to a school that an applicant is interested in attending the institution. Without this notification, schools would not be aware that the applicant is eligible and is requesting student financial aid packaging.	01/03/2000	High	Low	Med	To mitigate the risk that an ISIR cannot be generated, ED would maintain a copy of the last transmission prior to failure for schools to use for 1999 – 2000 students.	In the case that ISIRs cannot be generated, ED would provide schools with paper copies of the ISIR and SAR.

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Minimum Acceptable Level of Service:

	<u>1999-2000</u>	<u>2000-2001</u>
ISIR is correct and SAR is incorrect	3 weeks	3 weeks
SAR is correct and ISIR is incorrect	N/A	1 week

Decomposition of Sub-Process:				3. Generate an SAR (Student Aid Report) – An SAR is the paper report mailed to an applicant to announce the results of his or her aid application.				
Core Business Process:				Student Aid Application and Eligibility Determination Process				
Scenario Section				Business Priority Section			Possible Options	
Failure Source	Threat/Failure Scenario	Impact/End Result	Earliest Failure Date	Business Priority Impact Risk Priority			Risk Mitigation Options	High-Level Contingency Options
				Rating	Rating	Rating		
CPS Core Processing	Hardware, software, or mail outages are experienced	Students and families will not know the outcome of their application for federal student aid. If corrections need to be made or if additional information should be provided, these actions may not be taken. In many cases, this could affect the student’s ultimate financial aid package, particularly if deadlines are missed or if limited aid is allocated without consideration of that student’s need.	01/03/2000	Low	Low	Low	None.	In the case that SARs cannot be generated, ED would inform the public of alternative ways to receive eligibility information (e.g., ED Customer Service).

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Minimum Acceptable Level of Service: N/A

Decomposition of Sub-Process:				4. National Student Loan Data System (NSLDS) – NSLDS generates CPS reports, which includes applicants’ expected family contribution and address information.				
Core Business Process:				Student Aid Application and Eligibility Determination Process				
Scenario Section				Business Priority Section			Possible Options	
Failure Source	Threat/Failure Scenario	Impact/End Result	Earliest Failure Date	Impact Rating	Priority Rating	Risk Rating	Risk Mitigation Options	High-Level Contingency Options
NSLDS	Software or communications fail.	Failure of the NSLDS impacts the determination of eligibility for an applicant who might be ineligible for TitleIV aid as the result of a previous defaulted loan or the requirement to repay Title IV aid.	01/03/2000	Low	Low	Low	To mitigate the risk that users cannot access NSLDS, ED would inform NSLDS users of alternative sources of information (e.g. ED CUSTOMER SERVICE).	In the case that student loan data from NSLDS is unavailable, ED would re-process records after the failure is repaired and provide a processed record (EFC) in the interim.

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Minimum Acceptable Level of Service: N/A

Decomposition of Sub-Process:				5. Direct Loan Systems – Data is transmitted to the Direct Loan Origination System to establish eligibility for Direct Loans.				
Core Business Process:				Student Aid Application and Eligibility Determination Process				
Scenario Section				Business Priority Section			Possible Options	
Failure Source	Threat/Failure Scenario	Impact/End Result	Earliest Failure Date	Impact Rating	Risk Rating		Risk Mitigation Options	High-Level Contingency Options
Direct Loan Systems	Software or communications fail.	Data needed to originate Direct Loans and to determine eligibility for subsidized and unsubsidized loans would be unavailable.	01/03/2000	High	Low	Med	None.	In the case that the Direct Loan Origination System cannot be accessed, ED would implement alternative access to EFC information for Direct Loan systems.

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Minimum Acceptable Level of Service:

1999-2000 2000-2001

1 week 1 week

Decomposition of Sub-Process:				6. Pell/RFMS – Pell/RFMS data is transmitted to the PGRFMS/RFMS systems to establish Pell Grant eligibility and payment amount.				
Core Business Process:				Student Aid Application and Eligibility Determination Process				
Scenario Section				Business Priority Section			Possible Options	
Failure Source	Threat/Failure Scenario	Impact/End Result	Earliest Failure Date	Impact Priority Rating Rating	Risk Rating		Risk Mitigation Options	High-Level Contingency Options
RFMS	Software or communications fail.	Without eligibility information, PGRFMS/RFMS would not have the information needed to make and reconcile Pell Grant payments to institutions.	01/03/2000	High	Low	Med	None.	In the case that access to the RFMS system fails, ED would implement alternative access to EFC information for PGRFMS/RFMS.

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Minimum Acceptable Level of Service: N/A

Decomposition of Sub-Process: 7. Other Aid Providers – Data is provided to private student aid providers for their award processes.								
Core Business Process: Student Aid Application and Eligibility Determination Process								
Scenario Section				Business Priority Section			Possible Options	
Failure Source	Threat/Failure Scenario	Impact/End Result	Earliest Failure Date	Impact Rating	Risk Priority Rating		Risk Mitigation Options	High-Level Contingency Options
External Entities	Software or communications fail.	Other aid providers would not have access to EFC information, which is needed to process package awards.	01/03/2000	Undet	Undet	Undet	None.	In the case that external systems prevent other aid providers from accessing EFC information, ED would ensure alternative access to this data.

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Minimum Acceptable Level of Service: N/A

Decomposition of Sub-Process: 8. State Agencies – Data is provided to state student aid providers for their award processes.								
Core Business Process: Student Aid Application and Eligibility Determination Process								
Scenario Section				Business Priority Section			Possible Options	
Failure Source	Threat/Failure Scenario	Impact/End Result	Earliest Failure Date	Impact Rating	Risk Priority Rating		Risk Mitigation Options	High-Level Contingency Options
External Entities	Software or communications fail.	State agencies would not have the information available to process state-based financial aid awards.	01/03/2000	Undet	Undet	Undet	None.	In the case that data could not be electronically provided to state agencies and guarantors, ED would implement alternative access to EFC information.

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Minimum Acceptable Level of Service: N/A

Decomposition of Sub-Process:				9. The Department of Education Budget Process – The Department of Education uses management information to prepare the prospective year’s budgets.				
Core Business Process:				Student Aid Application and Eligibility Determination Process				
Scenario Section				Business Priority Section			Possible Options	
Failure Source	Threat/Failure Scenario	Impact/End Result	Earliest Failure Date	Impact Rating	Priority Rating	Risk Rating	Risk Mitigation Options	High-Level Contingency Options
Department of Education	The management reporting system is not available.	The Department would not have the necessary information to project the budget impact of the application volumes.	01/03/2000	Low	Low	Low	To mitigate the risk that management information would be unavailable for the preparation of Department budgets, ED would maintain several generations of CPS data in a format that could be loaded to internal department data stores.	In the case that the management reporting system is unavailable, ED would implement alternative data store query options to collect management information data.

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Minimum Acceptable Level of Service: N/A

Decomposition of Sub-Process: 10. Foreign Schools – Data is provided to foreign schools for eligibility purposes.								
Core Business Process: Student Aid Application and Eligibility Determination Process								
Scenario Section				Business Priority Section			Possible Options	
Failure Source	Threat/Failure Scenario	Impact/End Result	Earliest Failure Date	Impact Rating	Risk Priority Rating		Risk Mitigation Options	High-Level Contingency Options
External Entities	Software or communications fail.	Foreign schools would not be able to award institutional aid or apply for FFEL loans.	01/03/2000	Undet	Undet	Undet	None.	None.

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Minimum Acceptable Level of Service:

1999-2000 2000-2001

1 weeks 1 weeks

Decomposition of Sub-Process:				1. Receive paper FAFSA through MDE (Multiple Data Entry) – MDE represents the data entry processor for the paper application process.				
Core Business Process:				Student Aid Application and Eligibility Determination Process				
Scenario Section				Business Priority Section			Possible Options	
Failure Source	Threat/Failure Scenario	Impact/End Result	Earliest Failure Date	Impact Priority Rating Rating	Risk Rating		Risk Mitigation Options	High-Level Contingency Options
MDE	Hardware, software, or communications channels fail.	Eighty percent of the application data received by the central processor is sent through the MDE process. Failure of the MDE process would mean that data could not be delivered through this channel.	01/03/2000	High	Low	Med	To mitigate the risk that data sent through the MDE process is unavailable to the central processor, ED would assure that the ADE has sufficient capacity to take over MDE responsibilities.	In the case that the MDE process fails, ED would revert to processes used at the MDE sites before the automated OCR version of MDE. This would allow for the direct keying of the applications.

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Minimum Acceptable Level of Service: N/A

Decomposition of Sub-Process:				2. Receive FAFSA through FAFSA on the Web – FAFSA on the Web is the electronic application process available directly to students and families on the Internet. This data is transmitted, via the Internet, to the CPS.				
Core Business Process:				Student Aid Application and Eligibility Determination Process				
Scenario Section				Business Priority Section			Possible Options	
Failure Source	Threat/Failure Scenario	Impact/End Result	Earliest Failure Date	Impact Rating	Risk Rating		Risk Mitigation Options	High-Level Contingency Options
Network	Software or Web access fails.	The number of channels for data entry to the CPS would be reduced. Users of FAFSA on the Web might not have ready access to a paper application or other entry points. The increased processing time for mailing might affect an applicant's student financial aid package. This would also put more stress on the MDE process.	01/03/2000	Low	Low	Low	To mitigate the risk that applicants cannot submit the FAFSA via the Web, ED would assure that there are redundant Y2K compliant servers.	In the case that FAFSA on the Web fails, ED would switch to EDEExpress, FASFA Express or use paper applications.

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Minimum Acceptable Level of Service: N/A

Decomposition of Sub-Process:				3. Receive FAFSA through FAFSA Express – FAFSA Express is the process by which students and families are able to download FAFSA application software, complete an application offline, and transmit that information to CPS through a dial-up connection.				
Core Business Process:				Student Aid Application and Eligibility Determination Process				
Scenario Section				Business Priority Section			Possible Options	
Failure Source	Threat/Failure Scenario	Impact/End Result	Earliest Failure Date	Impact Priority Rating Rating	Risk Rating		Risk Mitigation Options	High-Level Contingency Options
Network	Software fails.	The number of channels of entry to the CPS would be reduced. Users of FAFSA Express might not have ready access to a paper application or other entry points. The increased processing time for mailing might affect an applicant's student financial aid package. This would also put more stress on the MDE process.	01/03/2000	Low	Low	Low	To mitigate the risk that FAFSA Express software fails, ED would ensure that the public is aware of alternative application processes.	In the case that FAFSA Express is inaccessible, ED would switch to FAFSA on the Web or use paper applications.

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Minimum Acceptable Level of Service: N/A

Decomposition of Sub-Process:				4. Receive FAFSA through EDEExpress – EDEExpress is the process by which students and families are able to complete a FAFSA by providing information to a school. EDEExpress data is transmitted to the CPS via the TIVWAN.				
Core Business Process:				Student Aid Application and Eligibility Determination Process				
Scenario Section				Business Priority Section			Possible Options	
Failure Source	Threat/Failure Scenario	Impact/End Result	Earliest Failure Date	Impact Rating	Risk Rating		Risk Mitigation Options	High-Level Contingency Options
Network	Software or communication channels fail.	The number of channels of entry to the CPS would be reduced. Schools using EDEExpress as an integrated process for Direct Loans would also be affected. Users of EDEExpress might not have ready access to a paper application or other entry points. The increased processing time for mailing might affect an applicant’s student financial aid package. This would also put more stress on the MDE process.	01/03/2000	Low	Low	Low	To mitigate the risk that users cannot access EDEExpress, ED would assure that FAA’s are aware of alternative processes.	In the case that EDEExpress is unavailable, ED would switch to MDE, FAFSA on the Web, or FAFSA Express.

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Minimum Acceptable Level of Service:

1999-2000 2000-2001

1 week 1 week

Decomposition of Sub-Process:				5. Receive paper FAFSA through Alternate Data Entry (ADE) – ADE provides an alternative to the MDE data process. ADE, unlike MDE, is manual data entry and does not rely on automated scanner technology. It is currently used to provide greater processing ability during high data entry demand periods.				
Core Business Process:				Student Aid Application and Eligibility Determination Process				
Scenario Section				Business Priority Section			Possible Options	
Failure Source	Threat/Failure Scenario	Impact/End Result	Earliest Failure Date	Impact Priority Rating	Risk Rating		Risk Mitigation Options	High-Level Contingency Options
ADE	Hardware or software fails.	ADE is the alternative to the highly automated MDE process if MDE should fail. The ADE process also serves to provide greater processing volume in times of high demand. Failure of this process could delay processing of applications, affecting students' ability to meet packaging deadlines for aid applications.	01/03/2000	Med	Low	Med	To mitigate the risk that ADE processes fail, ED would assure there is sufficient MDE capacity and that direct keying of application data is possible at all MDE sites.	In the case that ADE processes fail, ED would implement the direct entry of data at the MDE sites, if needed.

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SFA Application and Eligibility Determination Core Processing

Minimum Acceptable Level of Service: N/A

Decomposition of Sub-Process:				6. Eligibility match with SSA (Social Security Administration) – Information from the SSA is used to ensure the validity of an applicant's social security number and the social security benefits being claimed.				
Core Business Process:				Student Aid Application and Eligibility Determination Process				
Scenario Section				Business Priority Section			Possible Options	
Failure Source	Threat/Failure Scenario	Impact/End Result	Earliest Failure Date	Impact Priority Rating Rating	Risk Rating		Risk Mitigation Options	High-Level Contingency Options
SSA	Software or communications fail.	The inability to receive information from the SSA would affect eligibility determination for an applicant. This might allow misreporting of Social Security Numbers..	01/03/2000	Med	Low	Med	To mitigate the risk of information from the SSA being unavailable, ED would use positive matches (those whose eligibility is affected) from the previous year.	In the case that information from the SSA is unavailable, ED would reprocess records after the failure and provide processed record and EFC calculation in the interim.

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Minimum Acceptable Level of Service: N/A

Decomposition of Sub-Process:				7. Department of Justice – Data from the U.S. Department of Justice is used to determine if the applicant has been restricted from receiving federal financial assistance as a result of a drug conviction.				
Core Business Process:				Student Aid Application and Eligibility Determination Process				
Scenario Section				Business Priority Section			Possible Options	
Failure Source	Threat/Failure Scenario	Impact/End Result	Earliest Failure Date	Impact Rating	Risk Rating		Risk Mitigation Options	High-Level Contingency Options
DOJ	Software or communications fail.	Inability to receive data from the DOJ impacts eligibility determination for federal student aid for those applicants that might be barred from Title IV funds as a result of a drug conviction.	01/03/2000	Low	Low	Low	To mitigate the risk of information from the DOJ being unavailable, ED would use positive matches (those whose eligibility is affected) from the previous year.	In the case that data from the DOJ is unavailable, ED would reprocess records after the failure and provide an EFC in the interim.

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Minimum Acceptable Level of Service: N/A

Decomposition of Sub-Process:				8. NSLDS – Information from the National Student Loan Data System (NSLDS) is used to determine an applicant’s eligibility to receive aid based on the repayment of a prior student loan.				
Core Business Process:				Student Aid Application and Eligibility Determination Process				
Scenario Section				Business Priority Section			Possible Options	
Failure Source	Threat/Failure Scenario	Impact/End Result	Earliest Failure Date	Impact Rating	Risk Rating		Risk Mitigation Options	High-Level Contingency Options
NSLDS	Software or communications fail.	Failure of the NSLDS impacts the determination of eligibility for an applicant that might be ineligible for Title IV funds as the result of default of a student loan.	01/03/2000	Low	Low	Low	To mitigate the risk that student loan repayment information from NSLDS is unavailable, ED would use positive matches (those whose eligibility is affected) from the previous year.	In the case that student loan repayment information from NSLDS is unavailable, ED would reprocess records after the failure and provide EFC in the interim.

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Minimum Acceptable Level of Service: N/A

Decomposition of Sub-Process:				9. Institution eligibility match with PEPS – Data from PEPS is used to continually update the universe of schools eligible for federal student aid.				
Core Business Process:				Student Aid Application and Eligibility Determination Process				
Scenario Section				Business Priority Section			Possible Options	
Failure Source	Threat/Failure Scenario	Impact/End Result	Earliest Failure Date	Impact Rating	Risk Rating		Risk Mitigation Options	High-Level Contingency Options
IPOS	Software or communications fail.	Without certification of an institution as eligible (or ineligible) to participate in Title IV programs, inaccurate information will be sent to the applicant.	01/03/2000	Low	Low	Low	To mitigate the risk that data regarding the eligibility of schools to participate in federal student aid programs is unavailable, ED would send student data to the schools listed on the student's record, notifying student of possible re-processing..	In the case that school eligibility data is unavailable, ED would reprocess records after the failure and provide a processed record and calculate an EFC in the interim.

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Minimum Acceptable Level of Service: N/A

Decomposition of Sub-Process:				10. Citizenship match with INS (Immigration and Naturalization Service) – Data from INS is used to determine if the applicant is reporting incorrect information about their citizenship status.			
Core Business Process:				Student Aid Application and Eligibility Determination Process			
Scenario Section				Business Priority Section			Possible Options
Failure Source	Threat/Failure Scenario	Impact/End Result	Earliest Failure Date	Impact Rating	Risk Rating		
INS	Software or communications fail.	Inability to receive citizenship data from INS impacts the determination of eligibility for an applicant. Ineligible residents of the U.S. might appear as eligible.	01/03/2000	Low	Low	Low	<p>To mitigate the risk that citizenship data cannot be received from INS, ED would use positive matches (those whose eligibility is affected) from the previous year.</p> <p>In the case that citizenship data is unavailable, ED would reprocess records after the failure and provide a processed record and calculate an EFC in the interim.</p>

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Minimum Acceptable Level of Service: N/A

Decomposition of Sub-Process:				11. Selective Service System – Data from the Selective Service System is used to determine if the applicant has registered for the draft, if required.				
Core Business Process:				Student Aid Application and Eligibility Determination Process				
Scenario Section				Business Priority Section			Possible Options	
Failure Source	Threat/Failure Scenario	Impact/End Result	Earliest Failure Date	Impact Rating	Risk Rating		Risk Mitigation Options	High-Level Contingency Options
Selective Service	Software or communications fail.	Inability to receive data from the Selective Service System impacts the determination of eligibility for an applicant. Ineligible students who have not registered with Selective Service might appear as eligible.	01/03/2000	Low	Low	Low	To mitigate the risk that data cannot be received from the Selective Service System, ED would use positive matches (those whose eligibility is affected) from the previous year.	In the case that Selective Service data cannot be received, ED would reprocess records after the failure and provide a processed record and calculate an EFC in the interim.

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SFA Application and Eligibility Determination Inputs
Minimum Acceptable Level of Service: N/A

Decomposition of Sub-Process:				12. Veteran's benefit match with Veterans Affairs – Data from the Department of Veteran's Affairs is used to determine if veteran's benefits are being reported correctly on the FAFSA.				
Core Business Process:				Student Aid Application and Eligibility Determination Process				
Scenario Section				Business Priority Section			Possible Options	
Failure Source	Threat/Failure Scenario	Impact/End Result	Earliest Failure Date	Impact Rating	Priorit Rating	Risk Rating	Risk Mitigation Options	High-Level Contingency Options
Veterans Affairs	Software or communications fail.	Inability to receive data from the Department of Veteran's Affairs impacts the determination of eligibility for an applicant. Ineligible recipients of SSA benefits (those who have misreported their benefits) might appear as eligible.	01/03/2000	Low	Low	Low	To mitigate the risk that data cannot be received from Veteran's Affairs, ED would use positive matches (those whose eligibility is affected) from the previous year.	In the case that data cannot be received from Veteran's Affairs, ED would reprocess records after the failure and provide a processed record and calculate and EFC in the interim.